

ROS.24356

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

LEASA AND BRET WILLIAMS,
Plaintiffs,

V.

ROSS STORES, INC.,
Defendant.

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CIVIL ACTION NO. 4:19-cv-00872

APPENDIX TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

APPX.	PAGES	DOCUMENT
A	1-9	Deposition of Plaintiff Leasa Williams – Redacted for size and relevance
B	10	Store surveillance video (courtesy copies being provided to the Court and Plaintiffs’ counsel)
C	11	Video still image attached as Exhibit 2 to the Deposition of Leasa Williams
D	12	Video flip images attached as Exhibit 3 to the Deposition of Leasa Williams
		Non-Published Cases (per Judge Rule II(C)) (Cases have been annotated, and redacted for size and relevance)
E	13-16	<i>ADT LLC v. Capital Connect, Inc.</i> , 2017 WL 1426302 (N.D. Tex. 2017)
F	17-19	<i>Carter v. Tarantino Properties, Inc.</i> , 2019 WL 346895 (Tex. App.—Houston [1st Dist.] 2019, no pet. h.)
G	20	<i>Dangler v. Kohl’s Dep’t Stores, Inc.</i> , 2015 WL 12532127 (S.D. Tex. 2015)
H	21-24	<i>Diaz v. D.R. Wright Enterprises, Inc.</i> , 2018 WL 3484227 (Tex. App.—Dallas 2018, no pet. h.)
I	25-27	<i>Henson v. Kroger Texas, L.P.</i> , 2017 WL 2168526 (N.D. Tex. 2017)
J	28-29	<i>Hernandez v. Sun Crane & Hoist, Inc.</i> , 2018 WL 5725243 (Tex. App.—Dallas 2018, no pet. h.)
K	30-31	<i>Hughes v. Kroger Texas L.P.</i> , 2016 WL 3390510 (N.D. Tex. 2016)
L	32-35	<i>Lippoldt v. Quillian</i> , 2016 WL 7405811 (Tex. App.—Fort Worth 2016, no pet.)
M	36-37	<i>Lovo v. Express Courier Int’l, Inc.</i> , 2019 WL 387367 (N.D. Tex. 2019)
N	38-41	<i>Lowery v. Wal-Mart Stores Texas, LLC</i> , 2017 WL 999259 (S.D. Tex. 2017)
O	42-43	<i>Manna v. Ross Dress for Less, Inc.</i> , 2019 WL 4087376 (W.D. Tex. 2019)
P	44-46	<i>Mata v. Energy Absorption Sys., LLC</i> , 2011 WL 1233584 (Tex. App.—Houston [1st Dist.] 2011, no pet.)

Q	47-51	<i>Molina v. HEB Grocery Co., L.P.</i> , 2017 WL 4766655 (Tex. App.—Austin 2017, no pet.) ¹
R	52-54	<i>Nethery v. Turco</i> , 2017 WL 2774448 (Tex. App.—Dallas 2017, no pet.)
S	55-59	<i>Simpson v. Orange County Bldg. Materials, Inc.</i> , 2019 WL 470090 (Tex. App.—Beaumont 2019, no pet. h)
T	60-61	<i>Smith v. Dallas County Hosp. Dist.</i> , 2014 WL 6991482 (N.D. Tex. 2014)

Respectfully submitted,

**FLETCHER, FARLEY
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/s/ Fernando P. Arias

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was electronically filed via the Court's CM/ECF system and a true and correct copy of same was delivered to all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on this the 16th day of April, 2020.

/s/ Fernando P. Arias

FERNANDO P. ARIAS

¹ This case was mistakenly included as a string-sight, and while it is a premises liability case, addresses more directly a slip-and-fall scenario. Therefore, there are no annotations in the case.